

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
MOISES RAMOS-QUINONES,	:	
JESSICA RIVERA-LUGO	:	CHAPTER 13
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS,	:	
CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
MOISES RAMOS-QUINONES,	:	
JESSICA RIVERA-LUGO	:	
Respondent(s)	:	CASE NO. 1:23-bk-02905-HWV

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

COMES NOW Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that Debtor(s) has/have not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtor(s)' disposable income is greater than that which is committed to the Plan based upon disposable income on Schedules I and J and specifically disputes the following amounts:

a. Excess disposable income.

2. Debtor(s)' Plan violates 11 U.S.C. § 1325(b)(1) in that the Plan does not provide for the payment of all of Debtor(s)' projected disposable income for a minimum period of three years.

*[The remainder of this page has been left intentionally blank.]*

WHEREFORE, Trustee alleges and avers that the plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor(s)' Plan;
- b. dismiss or convert Debtor(s)' case; and
- c. provide such other relief as is equitable and just.

Dated: August 19, 2025

Respectfully submitted:

/s/ Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

John M. Hyams, Esquire  
1007 North Front Street  
Suite 3  
Harrisburg, PA 17102

Dated: August 19, 2025

/s/ Matthew Harnsberger, Legal Assistant  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee